

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

	X	
	:	
<i>In re</i>	:	
	:	PROMESA
THE FINANCIAL OVERSIGHT AND	:	Title III
MANAGEMENT BOARD FOR PUERTO RICO,	:	
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO,	:	(Jointly Administered)
<i>et al.</i> ,	:	
	:	
Debtors. <sup>1</sup>	:	
	:	
	:	
	X	
	:	
<i>In re</i>	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	
	:	Case No. 17-BK-04780 (LTS)
	:	
PUERTO RICO ELECTRICAL POWER	:	
AUTHORITY (PREPA),	:	<b>Court Filing Relates only to PREPA</b>
	:	
Debtor.	:	
	X	

**[PROPOSED] ORDER GRANTING URGENT MOTION TO FILE  
UNDER SEAL UNREDACTED VERSION OF OBJECTION OF  
CORTLAND CAPITAL MARKET SERVICES LLC, AS ADMINISTRATIVE  
AGENT, AND SOLUS TO PREPA BONDHOLDER SETTLEMENT**

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17- BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Upon consideration of the *Urgent Motion to File Under Seal Unredacted Version of Objection Filings of Cortland Capital Market Services LLC, as Administrative Agent, and Solus to PREPA Bondholder Settlement* (the “Motion to Seal”), filed on October 30, 2019, and it appearing that (i) the Court has jurisdiction to consider the Motion to Seal and the relief requested therein pursuant to section 310 of the Puerto Rico Oversight, Management and Economic Stability Act (“PROMESA”); (ii) venue of this proceeding and the Motion to Seal is proper pursuant to section 307 of PROMESA; (iii) notice of the Motion to Seal was adequate and proper under the circumstances and no further or other notice need be given; and (iv) based on the statements made in the Motion to Seal, the Court finds that it is appropriate for Cortland and Solus to file under seal an unredacted version of the *Objection of Cortland Capital Market Services LLC, as Administrative Agent, and Solus to PREPA Bondholder Settlement* (the “Objection”) and *Declaration of Angela K. Herring in Support of Objection of Cortland Capital Market Services LLC, as Administrative Agent, and Solus to PREPA Bondholder Settlement* (together with exhibits thereto, the “Declaration”; with the Objection, the “Objection Filings”);

IT IS HEREBY ORDERED THAT:

1. The Motion to Seal is GRANTED.
2. Cortland and Solus are entitled to file full and unredacted versions of the Objection Filings under seal.
3. The Clerk of Court will provide all other parties that have signed the Protective Order [Dkt. No. 1322] access to the sealed materials through their counsel of record.
4. The duration of the period of the seal for the full and unredacted versions of the Objection Filings is determined by the terms of the Protective Order.

5. This Order is without prejudice to the rights of any party in interest to seek to unseal the documents or any part thereof.

Dated \_\_\_\_\_, 2019

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Honorable Laura Taylor Swain  
United States District Court Judge